

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

RICHARD CRAYCRAFT

Plaintiff,

v.

CIVIL ACTION NO.

NORTHERN RESOLUTION GROUP, LLC

Defendant.

JULY 30, 2012

COMPLAINT

1. Plaintiff seeks relief pursuant to the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692; Md. Ann. Code Commercial Law Maryland Consumer Debt Collection Act. § 14-204 et seq. ("MCDCA"); and the Md. Ann. Code Commercial Law Consumer Practices Act § 13-301 et seq.
2. The Court's jurisdiction is conferred by 15 U.S.C. 1692k and 28 U.S.C. 1331 and 1367.
3. Plaintiff is a natural person who resides in Centreville, MD.
4. Defendant is NOT a licensed collection agency in the State of Maryland and has a principal place of business as 7288 SHAWNEE ROAD, NORTH TONAWANDA, NEW YORK, 14120.
5. Plaintiff is a consumer within the FDCPA.
6. Defendant is a debt collector within the FDCPA.
7. Defendant is a collector within the MCDCA.

8. Defendant communicated with Plaintiff or others on or after one year before the date of this action, in connection with collection efforts with regard to Plaintiff's disputed debt allegedly owed for a pay day loan debt.

9. Defendant failed to obtain a collection agency license in the State of Maryland.

10. The Maryland Department of Financial Regulation sent out an advisory notice to all licensed collection agency's stating it was prohibited to collect pay day loan debt in the state of Maryland.

11. Defendant attempted to collect an amount in excess than that which was legally owed and violated §1692e (2) (a).

12. In the collection efforts, the Defendant violated the FDCPA; inter alia, section 1692e and f.

SECOND COUNT:

13. The allegations of the First Count are repeated and realleged as if fully set forth herein.

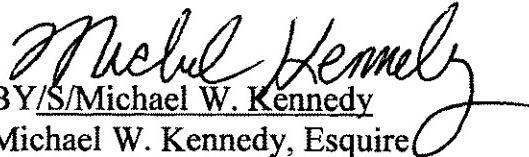
14. Within three years prior to the date of this action Defendant has engaged in acts and practices as to Plaintiff in violation of the Md. Ann. Code Commercial Law Maryland Consumer Debt Collection Act § 14-204 et seq. ("MCDCA").

15. Defendant has committed unfair or deceptive acts or practices within the meaning of the Md. Ann. Code Commercial Law Consumer Practices Act § 13-301 et seq.

WHEREFORE Plaintiff respectfully requests this Court to:

1. Award Plaintiff statutory damages pursuant to the FDCPA on Count I.
2. Award Plaintiff statutory damages pursuant to the MCDCA on Count II.
3. Award such other and further relief as this Court may see fit.

THE PLAINTIFF


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